



OPP General Notes – August 28, 2019

1. **Atrazine** – Rick informed Alex that he sent OPP's latest revisions to the Regulatory Update on the Registration Review of Atrazine based on feedback received from the OCSPP-IO. The paper compares and contrasts the FIFRA vs. ESA approaches to the assessments for atrazine. Alex and Rick will discuss comments at a later date.
2. **Peat Moss** – Rick told Alex that OPP plans to make a determination on whether Peat Moss is considered a pesticide by the end of the week. Sven said Senator Casey (PA) has inquired about the status.
3. **AEZ: Next Steps** – Rick reported that OPP had a productive conversation with OSCP and OGC (PTSLO and CCILO) on next steps for AEZ following the SAP chair's non-concurrence on the request to waive FIFRA SAP review of the rule. Questions were raised regarding whether the non-concurrence started the FIFRA review clock. After discussions with the OCSPP IO, Rick confirmed that the rule making process has not yet started. OSCP will schedule a conference call with the OCSPP IO and OPP to prepare for a meeting with the new SAP chair to seek clarification on the waiver non-concurrence, provide background on the history of the proposed rule, and discuss the review process. OPP will prepare talking points for review by the OCSPP-IO. The discussion will be scheduled once the OCSPP-IO is comfortable with the talking points.
4. **Invora Status** – Rick reported on a recent email he received from Bayer as a follow-up to discussions during the Invora stakeholder meeting earlier this month. There was some discrepancy about the timing for competing actions needed for the registration. Mike Goodis is reaching out to the company for clarification.
5. **Uncertainty Factors for Irritants/Corrosives** – Alex had comments on the draft science policy paper on Uncertainty Factors for Irritants/Corrosives. The purpose of the document is to reduce the default uncertainty factors for animal to human extrapolation and within human

variability for many antimicrobial chemicals. Alex said the Administrator is planning to make a statement on animal testing in September and she wants to make sure the paper doesn't conflict or send mixed messages about animal testing around the time of his message. Rick provided additional background for clarity.

6. **M-44** – On August 15th, the Agency announced the withdrawal of the August 8th Interim Decision to reevaluate the use of M-44 devices to allow further analysis and additional discussions with the registrants. Rick sent the IO proposed next steps. Ed Messina and Billy Smith have the lead on this issue and will meet with Alex soon. A copy of Administrator's statement is in the docket.
7. **ESA** – Rick informed the IO that the comment period closed on the draft revised method for ESA and 77 comments were submitted to the docket. The team is currently reviewing comments. Alex would like the team to draft a brief update, including a proposed timeline.
8. **Upcoming Registration Review Actions Request for Correction – Chlorpyrifos** – Wynne told Alex that she will send her a draft letter responding to the Center for Biological Diversity's request for corrections on OPP's Chlorpyrifos Columbia Raw Data webpage. Following the General, Wynne sent the draft letter to the IO on August 30th.

Waiting for OCSPP IO Feedback:

- Decision on Chestnut Status (Follow-up to 2/12 briefing; to be made after 4/5 meeting with registrant); OGC provided analysis on 7/25
- Status Summary of NMFS Salmonid Biological Opinions (7/9)
- PRIA Annual Report (sent 8/2)
- Calendar of next steps for FIFRA-ESA Farm Bill Working Group (sent 8/13)
- Draft Atrazine Update and Timeline for Release of Triazine PIDs (sent 8/21)
- Draft Guidance for Waiving Subacute Avian Dietary Tests (sent 8/22)
- Charge Questions for the Water Monitoring SAP (sent 8/24)
- Hemp 1-pager for Administrator's discussion with FDA (sent 8/22)
- ETO 1-pager for Administrator's discussion with FDA (sent 8/26)
- Mothballs, Tebupirimphos, and GQ4 Conventional Registration Review Cases - Background 1-Pagers (sent 8/28)
- Revised Atrazine ESA/FIFRA 1-Pager (Sent 8/28)
- Antimicrobial Registration Review Cases -- Background 1-Pagers (sent 8/29)
- Re-evaluation of the 24(c) Process document and FRN (sent 8/27)
- Draft response RFC Chlorpyrifos letter to CBD (sent 9/3)

- NOR Signed - Notice of Receipt for Oxitec EUP (sent 9/1)

OPP to Send to IO

- Ingredient Disclosure draft memo
- Revisions to APEP Draft Strategy (based upon David's comments)
- Update on Draft Biostimulants Guidance
- Synexis/Device Determination OPP implementation steps

Upcoming Briefings/Separate Meetings for the OCSPP-IO

- Spanish labeling (request to reschedule sent 7/9 and 8/5))
- PID for 2,4-D (scheduled for 9/4)

Other Briefings:

- Dicamba
- Decision on Invora
- Formetanate Registration Review (request sent 8/29)
- Registration Review Pipeline (request sent 9/3)
- UAVs